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19	UNITED STATES I	DISTRICT COURT
20	NORTHERN DISTRIC	CT OF CALIFORNIA
20		
21	CHASOM BROWN, WILLIAM BYATT,	CASE NO.: 4:20-cv-03664-YGR-SVK
22	JEREMY DAVIS, CHRISTOPHER	
22	CASTILLO, and MONIQUE TRUJILLO	PLAINTIFFS' ADMINISTRATIVE
23	individually and on behalf of all other similarly situated,	MOTION TO CONSIDER WHETHER GOOGLE'S MATERIAL SHOULD BE
	situated,	SEALED
24	Plaintiffs,	
25	v.	The Honorable Susan van Keulen
26	GOOGLE LLC,	
26	Defendant.	
27	Detendant.	I

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs' Response in Opposition to Google's Motion for Relief Regarding Preservation ("Plaintiffs' Response in Opposition").

Document or Portion of Document Sought to Be Sealed	Party Claiming Confidentiality	Basis for Sealing
Portions highlighted in blue of Plaintiffs' Response in Opposition	Google	Contains Material Designated "Confidential" or "Highly Confidential" by Google pursuant to the Protective Order
Excerpts from the December 3, 2021 deposition of Chris Liao, attached as Exhibit 1 to the Declaration of Ryan McGee	Google	Contains Material Designated "Confidential" or "Highly Confidential" by Google pursuant to the Protective Order
A document that Google produced during the Special Master Process, attached as Exhibit 2 to the Declaration of Ryan McGee	Google	Contains Material Designated "Confidential" or "Highly Confidential" by Google pursuant to the Protective Order
A document that Google produced during the Special Master Process, attached as Exhibit 3 to the Declaration of Ryan McGee	Google	Contains Material Designated "Confidential" or "Highly Confidential" by Google pursuant to the Protective Order

Under Civil Local Rule 79-5(f), Google, as the designating party, bears the burden of establishing that the designated material is sealable.

Dated: December 1, 2022	By /s/ John A. Yanchunis
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